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Police Department, Jacob Adams and Miguel Jahuey

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Fernando Garcia,

Plaintiff,

vs.

Corner Investment Company, LLC d/b/a The
Cromwell Las Vegas, Jacob Adams, Miguel
Jahuey, the Las Vegas Metropolitan Police
Department, a municipality, and Does I-XX,

Defendants.

Case Number:

2:22-cv-01960-MMD-VCF

**STIPULATION AND ORDER TO
EXTEND PLAINTIFF'S AND LVMPD
DEFENDANTS' REPOSES TO
MOTION FOR SUMMARY
JUDGMENT DEADLINE**

(FIRST REQUEST)

The Parties, Plaintiff Fernando Garcia ("Plaintiff"), by and through their attorneys of record, Robert A. Nersesian, Esq. and Thea Marie Sankiewicz, Esq., with the law firm of Nersesian & Sankiewicz and Defendants, Las Vegas Metropolitan Police Department ("LVMPD"), Officer Jacob Adams ("Adams") and Officer Miguel Jahuey ("Jahuey") (collectively "LVMPD Defendants"), by and through their attorneys of record, Craig R. Anderson, Esq. and Jackie V. Nichols, Esq., with the law firm of Marquis Aurbach, and hereby agree and jointly stipulate the following:

1. This request for an extension of time is not sought for an improper purpose or other purpose of delay. Due to the holidays and schedules of counsel, the Parties are seeking an extension of the response deadlines to competing motions for summary judgment. This is the first request for extension of time in this matter. The parties

1 respectfully submit that the reasons set forth above constitute compelling reasons for the
2 modest extension.

3 2. The Parties further agree, LVMPD Defendants' Response to Plaintiff's
4 Motion for Partial Summary Judgment Establishing Liability [ECF No. 55] deadline
5 currently set for December 13, 2023 shall be extended to Wednesday, December 27, 2023.

6 3. The Parties further agree, Plaintiff's Opposition to LVMPD Defendants'
7 Motion for Summary Judgment [ECF No. 57] deadline currently set for December 18, 2023
8 shall be extended to Tuesday, January 2, 2024.

9 4. WHEREFORE, the parties respectfully request that LVMPD Defendants'
10 Opposition to Plaintiff's Motion for Partial Summary Judgment Establishing Liability [ECF
11 No. 55] be extended to and including Wednesday, December 27, 2023 and Plaintiff's
12 Opposition to LVMPD Defendants' Motion for Summary Judgment [ECF No. 57] be
13 extended to and including Tuesday, January 2, 2024.

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5. This Stipulation is being entered in good faith and not for purposes of delay.
IT IS SO STIPULATED.

Dated this 12th day of December, 2023.

Dated this 12th day of December, 2023.

NERSESIAN & SANKIEWICZ

MARQUIS AURBACH

By: /s/ Robert A. Nersesian
Robert A. Nersesian, Esq.
Nevada Bar No. 2762
Thea Marie Sankiewicz, Esq.
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528 S. Eighth Street
Las Vegas, Nevada 89101
Attorneys for Plaintiff Fernando Garcia

By: /s/ Jackie V. Nichols
Craig R. Anderson, Esq.
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10001 Park Run Drive
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Attorneys for Defendants Las Vegas
Metropolitan Police Department, Jacob
Adams and Miguel Jahuey

ORDER

The above Stipulation is hereby GRANTED.

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: December 12, 2023

MARQUIS AURBACH
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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND PLAINTIFF'S AND LVMPD DEFENDANTS' REPONSES TO MOTION FOR SUMMARY JUDGMENT DEADLINE (FIRST REQUEST)** with the Clerk of the Court for the United States District Court by using the court's CM/ECF system on the 12th day of December, 2023.

☒ I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

☐ I further certify that some of the participants in the case are not registered CM/ECF users. I have mailed the foregoing document by First-Class Mail, postage prepaid, or have dispatched it to a third party commercial carrier for delivery within 3 calendar days to the following non-CM/ECF participants:

N/A

/s/ Krista Busch

An employee of Marquis Aurbach

MARQUIS AURBACH

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